III. REMARKS

1. Claims 1, 4-6, 9-11, 15-18, 20, 22-24, 28, 29, 31 and 35 are amended. Claims 21, 30 and 36 are cancelled.

2. Claims 1, 6, 11 and 24 are amended to overcome the rejection under 35 USC 112, first paragraph.

3. Claims 1, 6, 11 and 24 are amended to overcome the rejection under 35 USC 112, second paragraph.

4. Claims 1-20, 22-39 and 31-35 are patentable under 35 USC 103(a) over the combination of Pyotsia et al. (US 7010294, hereinafter "Pyotsia") and Reid et al. (US 6182226, hereinafter "Reid").

4A. Claim 1 recites the module being configured to monitor and analyze the at least one semiconductor processing tool. This feature is not disclosed or suggested by the combination of Pyotsia and Reid.

All that is disclosed in Pyotsia are control valves 14-16 that can be controlled or configured by the management system 10. Pyotsia also discloses that the management system can read measurement or status data from the control valves 14-16. (Col. 5, L. 19-42). Nowhere does Pyotsia disclose or suggest a module being configured to monitor and analyze the at least one semiconductor processing tool as recited in Applicant's claim 1. Rather, Pyotsia specifically discloses that the typical intelligent field device is a control valve with a valve controller. (Col. 5, L. 10-18, see also Col. 1, L. 14-16 which recites field devices for industrial processes generally signify regulating devices, control devices, sensors, transducers and the

like directly connected to the process). Combining Pyotsia with Reid fails to remedy the above-described deficiency of Pyotsia as Reid is absolutely silent as to semiconductor processing tools. Thus, claim 1 is patentable over the combination of Pyotsia and Reid at least because their combination fails to disclose or suggest the module being configured to monitor and analyze the at least one semiconductor processing tool as recited in claim 1. Claims 6, 11 and 24 are patentable over the combination of Pyotsia and Reid for reasons similar to those described above with respect to claim 1.

4B. Claim 1 also recites the local network is configured to receive and display a suggestion, at the predetermined semiconductor processing tool, from a user on the remote network regarding the operation of the predetermined semiconductor processing tool being monitored on the local network. Nowhere is this feature disclosed or suggested by the combination of Pyotsia and Reid.

Column 6, line 63 through column 7, line 67 in no way discloses or suggests that the local network is configured to receive and display a suggestion, at the predetermined semiconductor processing tool, from a user on the remote network regarding the operation of the predetermined semiconductor processing tool being monitored on the local network as recited in Applicant's claim 1. It is submitted that the Examiner's reliance on column 6, lines 63 through column 7, lines 67 is misguided. All that is disclosed in this cited portion of Pyotsia is that the mobile terminal MT is provided with a WAP micro browser (Col. 7, L. 4-5). It is noted that <u>the mobile terminal is located remotely</u> from the valves 14-16 and communicates with the valves 14-16, in part, through a wireless network (i.e. mobile communication

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system 26) as is clearly evident from Figs. 2, 3 and 6 of Pyotsia. Pyotsia discloses that it may also be possible to create a WWW server 33 that includes the WAP gateway functionality 35, in order to facilitate end-to-end security solutions, or to achieve better access control or a guarantee of responsiveness. The WWW server 23 and 33 utilizes the data in the device database 22 for creating the interactive WWW pages for browsing the data and for control and configuration of the field devices. (Col. 7, L. 30-38). However, it is noted that the mobile terminal MT is used in Pyotsia to view these interactive WWW pages for controlling and configuring the valves 14-16. For example, Pyotsia specifically describes the mobile terminal MT browsing the diagnostic and configuration data in the device database 22 by means of the interactive WWW pages. (Col. 7, L. 40-42). In response to the requests and selections made by the user (of the mobile terminal MT) in the interactive WWW pages the WWW server 23 makes inquiries to the device database 22, and a new WWW page is created according to the data obtained from the database 22. (Col. 7, L. 42-47). This new WWW page is also displayed on the mobile terminal MT for allowing the user to make further selections or commands. In particular, Pyotsia discloses that according to the user's selection an appropriate piece of data is shown in the WWW page in text format, graphical format and/or any other suitable format, together with the fields or links for making further selections or commands. (Col. 7, L. 50-54). The server 23 or 33 translates the configuration or control commands made by the user (of the mobile terminal MT) in the interactive WWW page into configuration commands used in the interface between the WWW server 23 or 33 and the diagnostic system 21. The diagnostic system 21 forwards the control and configuration commands received from the server 23 or 33 to the valves 14-16. As a result, an "on-line" connection from the

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mobile terminal MT to the valves 14-16 is provided (Col. 7, L. 54-67). By means of the interactive user interface and the "on-line" connection of Pyotsia the maintenance personnel is able to retrieve information on the operation of the control valves and display it on the user interface of the mobile terminal. (Col. 8, L. 1-5).

Thus, as is clearly evident from the above-cited portions of Pyotsia the WWW pages are merely disclosed as being presented on the display of the mobile terminal MT. There is absolutely no disclosure or suggestion in Pyotsia of the local network being configured to receive and display a suggestion, at the predetermined semiconductor processing tool, from a user on the remote network regarding the operation of the predetermined semiconductor processing tool being monitored on the local network as recited in Applicant's claim 1.

Combining Pyotsia with Reid fails to remedy the above-described deficiency of Pyotsia. Reid is absolutely silent as to the local network being configured to receive and display a suggestion, at the predetermined semiconductor processing tool, from a user on the remote network regarding the operation of the predetermined semiconductor processing tool being monitored on the local network as recited in Applicant's claim 1. Therefore, claim 1 is patentable over the combination of Pyotsia and Reid because their combination fails to disclose or suggest the local network being configured to receive and display a suggestion, at the predetermined semiconductor processing tool, from a user on the remote network regarding the operation of the predetermined semiconductor processing tool being monitored on the local network as recited in Applicant's claim 1.

4C. Additionally, claim 1 recites that the remote network

receives the second data without an IP address of the predetermined semiconductor processing tool associated with the second data being known to the remote network. Nowhere does Pyotsia disclose or suggest this feature as Pyotsia specifically discloses that the identity of the valves must be known to allow the user to select a valve. One skilled in the art would not look to Reid for modifying Pyotsia as suggested by the Examiner.

It is again submitted that Pyotsia and Reid have been combined improperly as Pyotsia expressly teaches against a combination with Reid for the reasons submitted in Applicant's amendment filed on January 5, 2010, the arguments of which are incorporated by reference herein in their entirety. Modifying Pyotsia with Reid would change the principal of operation of Pyotsia as well as render Pyotsia unsuitable for its intended purpose.

The Examiner argues that because the rewrites in Reid can be based on users and thus, Reid can be combined with Pyotsia. Again the Examiner is misguided. Reid discloses a process that allows internal hosts (i.e. the users, see Fig. 2 which clearly shows the users as being part of the internal network in Reid) to be aliased to external addresses (Col. 6, L. 54-55) for preventing malicious activities on the part of both people inside and outside the organization (Col. 1, L. 16-19). Even though the rewrites in Reid can be based on users the address of the users is still hidden to the external network and even other users of the internal network. Thus, if Reid is applied to Pyotsia as suggested by the Examiner, the identity of the different valves 14-16 (which it is assumed the Examiner is equating to the users in Reid) would be aliased to an external address where the aliasing to the external addresses would be tailored to each valve 14-16 (i.e. based on the user or valve). Basing the

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aliasing on a specific valve does nothing to alleviate the fact that Reid discloses the identity of the user (or valve in this case) is still hidden (i.e. aliased to an external address) thereby hiding the identity of the valves 14-16 from the user of the mobile terminal MT. The Examiner appears to be picking pieces of Reid and reading them out of context without considering what is taught by the reference as a whole.

Contrary to the aliasing of internal hosts to external addresses and address hiding of Reid, Pyotsia specifically <u>requires</u> the <u>identity</u> of the field devices <u>to be known</u> in order for the user to access the field device. Thus, Pyotsia directly teaches against the address hiding and rewriting of Reid. For example, Pyotsia discloses remotely controlling, configuring or monitoring field devices with a general purpose mobile terminal (Col. 3, L. 6-10). In Pyotsia the user <u>knows exactly which field device within the plant is being accessed</u>. For example, referring to column 8, lines 30-65 Pyotsia discloses that the WWW server 23 or 33 is arranged to assist the selection of the desired field device by <u>providing a hierarchic set of WWW pages</u> representing the logical, functional or location architecture of the plant in a tree configuration. In Pytosia the user <u>selects a desired plant</u> 1, 2, 3, 4 from the WWW page shown in FIG. 4A and is then directed to a new WWW page where the user <u>selects an area of the plant</u> as shown in FIG. 4B. After the area of the plant is selected the user is presented with another new WWW page for <u>selecting the desired tag</u> from a list. After the desired tag is selected the user is presented with a WWW page of the desired field device. Pyotsia specifically recites that the tag is a unique code used for <u>identification of each field device</u> in the plant (Col. 8, L. 59-65).

Thus, one skilled in the art would not look to the address hiding and rewrites of Reid for modifying Pyotsia because Pyotsia expressly requires the identity of the field devices to be known in order for the user to select the identity of the field device from the list provided on the WWW page (i.e. Pyotsia teaches against its combination with Reid). Therefore, claim 1 is patentable over the combination of Pyotsia and Reid at least for this reason and for the reason that the combination of Pyotsia and Reid would render Pyotsia unsuitable for its intended purposes because the valves would no longer be identifiable to the user of the mobile terminal MT for the reasons described above.

As described above, Pyotsia requires the identity of the field devices to be known so they can be presented in the hierarchical set of WWW pages. This hierarchical set of WWW pages allows a user to select a specific field device in a specific location of a specific plant (Col. 8, L. 30-65). The address hiding and remapping of Reid would effectively remove the identity of the field devices, the plant and the location of the field devices within the plant the from these WWW pages leaving the user unable to access a specific field device located in a specific location of a specific plant as the user would no longer know or be able to determine the location of the field devices due to the address hiding and remapping leaving Pyotsia unsatisfactory for its intended purpose.

Thus, claim 1 is patentable over the combination of Pyotsia and Reid for the additional reasons that Pyotsia teaches against its combination with Reid and that the combination of Pyotsia with Reid would render Pyotsia unsuitable for its intended purpose. Claims 6, 11 and 24 are patentable over the combination of

Pyotsia and Reid for the additional reasons substantially similar to those additional reasons described above with respect to claim 1.

4D. In addition, claim 6 calls for the module being configured to allow one of the plurality of users <u>to select</u> at least one equipment diagnostic monitor systems from a plurality of equipment diagnostic monitor systems. This feature is not disclosed or suggested by the combination of Pyotsia and Reid. The Examiner admits that Pyotsia does not disclose a "plurality of equipment diagnostic monitoring systems. Therefore, Pyotsia cannot reasonably be considered as disclosing allowing one of the plurality of users to select at least one equipment diagnostic monitor system as called for in Applicant's claim 6. Despite the failure of Pyotsia to disclose the above noted features of claim 6, the Examiner asserts that one of ordinary skill in the art could have used more than one of Pyotsia's "diagnostic systems" to monitor the devices in various LAN network segments independently and the results of such extension of Pyotsia's invention would have been predictable in that the devices located at different segments of the LANs could be independently remotely controlled and monitored. This assertion appears to be based on nothing more than hindsight, especially given the fact that Pyotsia does not disclose or suggest allowing one of the plurality of users to select at least one equipment diagnostic monitor systems from a plurality of equipment diagnostic monitor systems as described above and as admitted by the Examiner. Reid is absolutely silent as to these features of claim 6. Thus, claim 6 is patentable over the combination of Pyotsia and Reid at least for this additional reason.

4E. Claim 6 also recites that the module is configured to convey both active requests and passive requests from a user on the remote network to at least one of the plurality of semiconductor processing tools of the local network. Nowhere is this feature disclosed or suggested by the combination of Pyotsia and Reid.

Pyotsia merely discloses a mobile terminal arranged to communicate over a cellular communication system with a control system connected to a plurality of field devices (i.e. control valves 14-16) in an industrial process in order to remote control, configure or monitor the field devices. (Abstract). Pyotsia is absolutely silent with respect to a module that is configured to convey both active requests and passive requests from a user on the remote network to at least one of the plurality of semiconductor processing tools of the local network as recited in Applicant's claim 6. Combining Pyotsia with Reid fails to remedy this deficiency of Pyotsia.

Reid merely discloses a firewall used to achieve network separation within a computing system having a plurality of network interfaces. (Abstract). Reid is also absolutely silent as to a module that is configured to convey both active requests and passive requests from a user on the remote network to at least one of the plurality of semiconductor processing tools of the local network as recited in Applicant's claim 6.

Thus, claim 6 is patentable over the combination of Pyotsia and Reid for the additional reason that their combination fails to disclose or suggest that the module is configured to convey both active requests and passive requests from a user on the remote network to at least one of the plurality of semiconductor processing tools of the local network as recited in claim 6.

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4F. It is noted that Applicant's arguments from the amendment filed on January 5, 2010 are also incorporated by reference herein in their entirety with respect to independent claims 11 and 24.

4G. Claims 2-5, 7-10, 12-20, 22, 23, 25-29 and 31-35 are patentable over the combination of Pyotsia and Reid at least by reason of their respective dependencies.

5. Claims 20, 22, 23 and 35 are patentable under 35 U.S.C. 103(a) over Pyotsia and Crist et al. (US 6879940, hereinafter "Crist"). It is noted that the Examiner again refers to Crist as being US Patent No. 6182226, which is incorrect as this is the Patent number for Reid. This error makes the office action unclear as to which patent the Examiner is referring to with respect to Crist and is grounds for issuance of a corrected office action. However, in the interest of expediting prosecution, Applicant is again assuming the Crist reference to be US Patent No. 6879940.
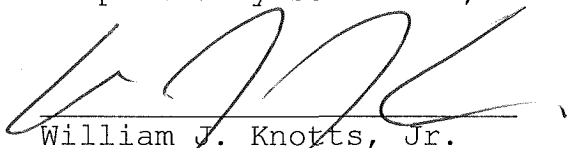
Claims 20, 22 and 23 depend from claim 11 and claim 35 depends from claim 1. It is submitted that because the combination of Pyotsia and Reid fails to disclose or suggest all the features of claims 1 and 11 that the combination of Pyotsia, Reid and Crist cannot as well. Therefore, claims 20, 22, 23 and 35 are patentable at least by reason of their respective dependencies.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should

any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

William J. Knotts, Jr.
Reg. No. 53,145

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Date

Perman & Green, LLP
99 Hawley Lane
Stratford, CT 06614
(203) 259-1800
Customer No.: 2512